

GARY CASTERLOW-BEY
PLAINTIFF

V.

AMAZON.COM
GOOGLE.COM
BARNES AND NOBLES.COM
EBAY.COM
TRAFFORD PUBLISHING COMPANY
DEFENDANTS

CASE NO. 17-cv-05833-RJB
5833

CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA
DEPUTY

COMPLAINT / CIVIL SUIT

JURY TRIAL DEMANDED

PURSUANT TO 18 U.S.C. § 1962

AND 1961(5) PLAINTIFF BRINGS
THIS CIVIL ACTION BEFORE THIS
COURT FOR APPROPRIATE
ADJUDICATION UNDER FEDERAL
LAW:

JURISDICTION:

1) RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT; UNDER 18 U.S.C. § 1962 AND 1961(5) GIVES THIS UNITED STATES DISTRICT COURT AUTHORITY AND SUBJECT MATTER JURISDICTION OVER THIS ISSUE/DISPUTE THAT ARISES OUT OF PLAINTIFFS ASSERTION THAT DEFENDANTS COLLABORATED IN CONCERTED CONSPIRACY TO DEPRIVE HIM HIS LEGAL COMPENSATION IN ROYALTIES FOR HIS COPYRIGHTED WORK. DEFENDANTS ACTED IN COLLUSION TO INFRINGE UPON PLAINTIFFS COPYRIGHTED MATERIAL THROUGH PRODUCTION OF FRAUDULENT CONTRACT. THIS ACTION CONSTITUTES FORGERY, FRAUD, CONSPIRACY, AND BREACH OF CONTRACT, ALL IN VIOLATION OF 18 U.S.C. § 1962 AND 1961(5).

2) PURSUANT TO 28 U.S.C. § 1332 AND 1331(6)(J) THIS COURT ALSO MAINTAINS SUBJECT MATTER JURISDICTION. FEDERAL QUESTION JURISDICTION BEING "DIVERSITY OF CITIZENSHIP." ALL CIVIL ACTIONS ARISING UNDER THE CONSTITUTION, LAWS,

OR TREATIES OF THE UNITED STATES, MUST BE ADRESSED
 IN UNITED STATES DISTRICT COURTS, AND THE AMOUNT OF MONEY
 IN CONTROVERSY EXCEEDS \$ 75,000. ⁰⁰
PROVISIONS FOR "CIVIL RICO" DEFINED:

[ANY PERSON INJURED IN HIS PERSON OR BUSINESS OR PROPERTY
 BY REASON OF VIOLATION OF SECTION 1962 OF THIS CHAPTER
 MAY SUE THEREFORE IN THE APPROPRIATE UNITED STATES
 DISTRICT COURT AND SHALL RECOVER (3) THREEFOLD THE
 DAMAGES HE SUSTAINS AND THE COST OF THE SUIT, SEE: 18
 U.S.C. § 1964(c). COURT CAN ALSO GRANT INJUNCTIONS AGAINST
 RICO VIOLATIONS, SEE: 18 U.S.C. § 1964(a)]

STATEMENT OF FACTS:

- 1.) IN ORDER TO MEET THE REQUIREMENTS TO SUCCEED IN ESTABLISHING A CIVIL RICO VIOLATION, PLAINTIFF MUST SHOW "TWO OR MORE PREDICATE ACTS" OF "RACKETEERING ACTIVITY" BY DEFENDANTS.
- 2.) THE PLAINTIFF ALSO MUST SHOW THAT THE RACKETEERING PREDICATES ARE RELATED, AND THAT THEY AMOUNT TO OR POSE A THREAT OF CONTINUED CRIMINAL ACTIVITY, SEE: H.J. INC. V. NORTHWESTERN BELL TELEPHONE CO., 492 U.S. 229, 109 S. CT. 2893.
- 3.) PLAINTIFF MUST SHOW AN ACTUAL "RICO" VIOLATION, WHICH USUALLY INVOLVES SOME SORT OF UNLAWFUL DEBT OR DEBT COLLECTION ACTIVITIES OR USE OF FUNDS OBTAINED FROM THEM, OR OTHER "PATTERN OF RACKETEERING ACTIVITY" WHAT "RICO" PROHIBITS IS SET OUT MUCH MORE PRECISELY AND IN MORE DETAIL IN 18 U.S.C. § 1962; ALSO SEE: TAPIA-ORTIZ V. WINTERS, 185 F.3d 8, 11 (2nd Cir 1991). THE STANDARD IS TO SHOW AT LEAST TWO ACTS OF RACKETEERING ACTIVITY WITHIN A 10 YEAR PERIOD, 18 U.S.C. § 1961(5)
- 4.) A CIVIL RICO PLAINTIFF MUST ALSO SHOW "INJURED IN HIS BUSINESS OR PROPERTY" BY THE RICO VIOLATION, WHICH COURTS HAVE

HELD MEANS A BUSINESS OR PROPERTY INJURY RECOGNIZED #3
 BY STATE LAW, SEE: DOE V. ROE, 958 F.2d 763, 768 (7TH CIR
 1992); ALLEY V. ANGELONE, 962 F. SUPP. 832-33 (E.D. Va. 1992).
 HERE, PLAINTIFF ASSERTS THAT HIS BOOKS, I.E. "THROUGH THE EYES
 OF A GANGSTER I; THROUGH THE EYES OF A GANGSTER II;
 AND WILDFLOWER-ANURBAN TALE," ARE ALL HIS BUSINESS. THE
 COPYRIGHTS TO ALL THREE OF THESE BOOKS ARE HIS PERSONAL
 PROPERTY, AND THAT HE HAS BEEN SEVERELY INJURED FINANCIALLY,
 EMOTIONALLY, AND PSYCHOLOGICALLY BY THE THEFT, UNLAWFUL
 DISTRIBUTION OF ALL THREE OF THESE COPYRIGHTED MATERIALS,
 DONE NATIONALLY AND INTERNATIONALLY BY DEFENDANTS IN A
 CONTINUOUS "COVERT OPERATION" DESIGNED TO DEPRIVE PLAINTIFF OF
 THE ROYALTIES FROM SALES OF ALL THREE BOOKS SINCE 2006.

STATE LAW ELEMENT / REQUIRE-
 MENTS UNDER 18 U.S.C. § 1962 AND 1961(5)

5) RACKETEERING ACTIVITY MUST ESTABLISH THE "PREDICATE
 ACTIVITY" IS RECOGNIZED AS BEING ILLEGAL UNDER STATE
 LAW, I.E. THEFT - RCW 9A.56.040(1)(b) AND 9A.56.040(1)(a); FORGERY
 RCW 9A.60.020(1)(a)(b). IDENTITY THEFT - RCW 9.35.020(3).
 DEFENDANTS, ACTING AS ACCOMPLICES, NATIONALLY AND INTERNATION-
 ALLY, AND IN WASHINGTON STATE FROM 2006 UNTIL SEPTEMBER
 2017, DID UNLAWFULLY, FELONIOUSLY, KNOWINGLY OBTAIN, POSSESS,
 USE OR TRANSFER A MEANS OF IDENTIFICATION, OR FINANCIAL
 INFORMATION, OR PROPERTY OF ANOTHER PERSON, LIVING OR
 DEAD; TO WIT: GARY CASTERLINE-BEJ, WITH INTENT TO COMMIT,
 OR TO AIDE OR ABET, ANY CRIME AND THEREBY OBTAIN AN
 AGGREGATED AMOUNT OF MONEY, GOODS, SERVICE, OR ANYTHING ELSE
 OF VALUE IN EXCESS OF ONE THOUSAND FIVE HUNDRED DOLLARS,
 CONTRARY TO RCW 9.35.020(1)(2)(a); AND THE CRIME IS AGGRAVATED
 BY THE FOLLOWING CIRCUMSTANCE: PURSUANT TO RCW 9.94A.535

(3)(d). PLAINTIFFS ASSERTIONS HAVE MAJOR ECONOMIC IMPLICATIONS, OR A SERIES OF OFFENSES, IDENTIFIED BY A CONSIDERATION / PROBABILITY OF ANY OF THE FOLLOWING FACTORS; 1.) THESE DEFENDANTS HAVE CREATED MULTIPLE PREDICATE OFFENSE DATING BACK TO 2006; 2.) THESE PREDICATE OFFENSES INVOLVE ACTUAL MONEY LOSS TO PLAINTIFF; 3.) THIS PREDICATE ACTIVITY INVOLVED A HIGH DEGREE OF SOPHISTICATION, PLANNING WITH BASICALLY CRIMINAL INTENT THAT OCCURRED OVER A ELEVEN YEAR PERIOD; 4.) DEFENDANTS USED THEIR TECHNICAL SAVVY, INTERNET ACUMEN, POSITIONS AS LEGITIMATE BUSINESSES TO MANIPULATE AND SABOTAGE THE RESPONSIBILITY TO COMPENSATE PLAINTIFF ADEQUATELY; 5.) USED THEIR FIDUCIARY RESPONSIBILITY TO FACILITATE THE COMMISSION OF WHAT AMOUNTS TO A CONTINUOUS CRIMINAL ENTERPRISE IMPLEMENTED UNDER A STEALTH PROGRAM.

6.) PLAINTIFF AUTHORED THE THREE AFOREMENTIONED BOOKS PUBLISHED THROUGH TRAFFORD PUBLISHING COMPANY.

7.) THE FIRST TWO CONTRACTS WERE FOR "THROUGH THE EYES OF A GANGSTER I AND II THE SEQUEL". WRITTEN IN 2006 AND 2008 RESPECTFULLY.

8) TRAFFORD HAS A FORGED, FRAUDULENT CONTRACT FOR THE THIRD BOOK "WILDFLOWER-AN URBAN TALE", SIGNED BY SOME UNKNOWN PERSON, WITH NON-EXISTENT ADDRESS, I.E. 15007 WESTSTORM LN SW, LAKWOOD, WA. 98498 AND PHONE NUMBER PLAINTIFF HAS NEVER HAD, I.E. (360) 451-8746. THIS BOGUS, ILLEGAL CONTRACT AUTHORIZES INTERNATIONAL SALES OF ALL THREE BOOKS.

9.) PLAINTIFF DECLARIES UNDER THE PENALTY OF PERJURY THAT HE HAS WITNESSED NUMEROUS PURCHASES OF THREE THREE BOOKS IN QUESTION FROM THE WEB PAGES OF ALL DEFENDANTS WEBSITES NAMED IN THIS CIVIL ACTION AND HE WAS NEVER COMPENSATED IN THE FORM OF ROYALTIES.

10.) PLAINTIFF ASSERTS HE IS READY TO PROVIDE DOCUMENTATION BEFORE THIS COURT PROOF OF NUMEROUS SALES FROM DEFENDANTS WEBSITES THAT UTILIZE AVENUES OF COMMERCE, I.E. INTER-STATES EFFECTING "INTERSTATE COMMERCE" AND AIRSPACE OVER THESE STATES CONSTITUTING INTERSTATE RACKETEERING AND CONSPIRACY.

11.) PLAINTIFF ASSERTS HE HAS MET ALL THE PRONGS TO PREVAIL ON CIVIL RICO VIOLATION SUIT... HIS BOOKS-BUSINESS, PROPERTY-COPYRIGHT, SUFFERED MAJOR FINANCIAL LOSS, EMOTIONAL, PSYCHOLOGICAL, AND MENTAL TRAUMA, THUS MEETING ACTUAL INJURY PRONG. THESE NUMEROUS ALLEGATIONS OF "PREDICATE ACTS" DATING BACK TO 2006 EXCEED 10 YEAR STATUTE. AND FRAUD, FORGERY, CONSPIRACY, THEFT, AND BREACH OF CONTRACT ARE ALSO STATUTORY CRIMINAL OFFENSES UNDER WASHINGTON STATE LAW.

CONCLUSION: RELIEF SOUGHT

1.) PLAINTIFF HAS ESTABLISHED A CURSORY VIEW OF CIVIL RICO VIOLATION WITHIN THE BODY OF THIS COMPLAINT/CIVIL SUIT AND PRAYS THIS COURT SERVE SUMMONS ON DEFENDANTS

PURSUANT TO § 1915 TO ACTIVATE THE PROCESS THAT #6
Case 3:17-cv-05633-RJB Document 5 Filed 10/30/17 Page 6 of 6
WILL ULTIMATELY BRING OTHER EVIDENCE TO THE SURFACE,
A PROCESS THAT WILL DELVE DOWN DEEP BENEATH THE
SURFACE TO EXPOSE THE HIDDEN JEWELS, THE SECRETS TO
OUTLINE AN ON GOING CONSPIRACY TO DEPRIVE PLAINTIFF HIS
RIGHTFUL COMPENSATION, RECOGNITION, AND HONOR AMONGST
HIS LITERARY PEERS.

2) FOR COMPENSATORY, PUNITIVE, AND CONSEQUENTIAL
DAMAGES, i.e. LOSS OF POTENTIAL EARNINGS, HOMELESSNESS,
EXPOSURE TO THE CRIMINAL ELEMENT AND INCARCERATION.
FOR PAIN AND SUFFERING THAT CAN NOT BE COMPUTATED
ON A CALCULATOR. FOR BEING ABUSED, DENIED, HUMILIATED,
DISRESPECTED, TAKEN ADVANTAGE OF, AND DECEIVED,
PLAINTIFF SEEKS \$25 MILLION DOLLARS IN TOTAL DAMAGES.
IT IS PRAYED UPON, Gary Casterlow-Bey

DECLARATION

I DECLARE UNDER THE PENALTY OF PERJURY THE FORE-
GOING IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE
DATED THIS 10TH DAY OF OCTOBER, 2017.

Gary Casterlow-Bey

GARY CASTERLOW-BEY
PRO SE LITIGANT
2017143013
910 TACOMA AVE S.
TACOMA, WASHINGTON
98402